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and Travelers Casualty and Surety Company*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA, for the use
and benefit of SUSTAINABLE MODULAR
MANAGEMENT, INC., a Texas corporation,

Plaintiff,

vs.

JE DUNN CONSTRUCTION
COMPANY; FEDERAL INSURANCE
COMPANY; HARTFORD FIRE
INSURANCE COMPANY; TRAVELERS
CASUALTY AND SURETY COMPANY
OF AMERICA; DOE Individuals I-X and
ROE Entities I-X, inclusive,

Defendants.

Case No.: 2:20-cv-00790-JAD-NJK

Compl. Filed: May 1, 2020

**STIPULATION TO EXTEND
ALL DEFENDANTS' TIME TO
RESPOND TO COMPLAINT**

(THIRD REQUEST)

This Stipulation to Extend all Defendants' Time to Respond to Complaint is made
by and between Plaintiff United States of America, for the use and benefit of Sustainable
Modular Management, Inc. ("Plaintiff") and Defendants JE Dunn Construction Company,
Harford Fire Insurance Company, and Travelers Casualty and Surety Company of
America ("Defendants") through their respective counsel, in light of the following facts:

RECITALS

A. Plaintiff filed the Complaint ("Complaint") on or about May 1, 2020.

1 B. Pursuant to the second Stipulation and Order to Extend All Defendants'
2 Time to Respond to Complaint, the current deadline for all defendants to respond to the
3 Complaint is June 26, 2020.

4 C. With the exception of Defendant Federal Insurance Company, all
5 defendants have been served.

6 D. Through an agreement with Plaintiff and Federal Insurance Company,
7 counsel for Defendants will be authorized to accept service on behalf of Federal Insurance
8 Company.

9 E. To allow time to coordinate the acceptance of service, and to allow all
10 defendants to provide a single response to Plaintiff's Complaint, the parties agreed that all
11 defendants shall have until Wednesday, July 1, 2020, to respond to the Complaint.

12 F. There is good cause to grant this stipulation because the extension avoids
13 the necessity of filing multiple responses to the Complaint, and the associated costs.

14 G. This stipulation is filed in good faith and not intended to cause delay.

15 H. Pursuant to Local Rule IA 6-2, Plaintiff and JE Dunn respectfully request
16 that the Court extend all defendants' time to respond to Plaintiff's Complaint through July
17 1, 2020.

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STIPULATION

NOW, THEREFORE, Plaintiff and Defendants hereby stipulate and agree that all defendants have up to and including July 1, 2020, to file a response to Plaintiff's Complaint.

IT IS SO STIPULATED.

DATED this 26th day of June, 2020.

DATED this 26th day of June, 2020.

MORRIS LAW GROUP

**LEWIS ROCA ROTHGERBER
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*Attorneys for Defendants JE Dunn
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Casualty and Surety Company*

Attorneys for Plaintiff

ORDER

IT IS SO ORDERED.



United States Magistrate Judge

DATED June 29, 2020

3993 Howard Hughes Pkwy, Suite 600
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Lewis Roca
ROTHGERBER CHRISTIE